Edwards 3/15/06 Declaration Exhibit G - Morrison July 27, 2005

Fran Morrison, R.N. HIGHLY CONFIDENTIAL New York, NY

	130
1	on this particular product, the price has gone
2	down by 20 percent. Would you ever go into a
3	clinic, for example, and say that there was a
4	special price, for example, on a given drug at
5	any given time?
6	A No.
7	Q Were there ever any special prices
8	on drugs that you could offer?
9	A Not that I could offer, no.
10	Q When you started as territory
11	business manager with BMS, you had these four
12	drugs initially. I can't remember if you added
13	as you went along.
14	A I can't remember either. I had
15	Paraplatin and Taxol. I had IFEX. I don't know
16	when I got Megace. When I started, I had
17	Paraplatin, IFEX, and Taxol.
18	Q Let's say that you went into a
19	particular customer with the idea of talking
20	about taxol, and that was the topic of the
21	meeting as you progressed. What sort of
22	questions would a customer ask you about Taxol?

Edwards 3/15/06 Declaration Exhibit G – Soule

Douglas Soule

HIGHLY CONFIDENTIAL Seattle, WA

April 26, 2005

11	
1	Thursi of the same
	physicians in my call list.
2	Q. Wow. After that first year you began
3	focusing more on the products?
4	A. That's correct.
5	Q. What products were you focusing on then?
6	A. Primarily the product lines we had then
7 🥛	were Taxol and Paraplatin. Taxol would, of course,
8	the generic name would be paclitaxel and Paraplatin
9	would be carboplatin. But Bristol-Myers Squibb has a
10	history of being the foremost leader in the oncology
11	field with the most product, so oftentimes we were
12 🤫	asked questions or for assistance on a wide variety
13 🦽	of products, from Blenoxane, Vepesid, cisplatin,
14 🔑	Megace oral suspension, CCNU, Hydroxia. I mean, just
15 6	a whole bunch of products that we've had in the past.
16 1	Very infrequently did questions come up about that,
17	and usually because of my lack of knowledge of that,
18 [would always refer back to our medical services
19 p	people for them to help out on that.
20	Q. So your primary focus on the products
21 p	perspective was Taxol and Paraplatin?
22	A. That's correct.